

**STATEMENT OF BASIS (AI No 31008)**

for draft Louisiana Pollutant Discharge Elimination System permit No LA0106976 to discharge to waters of the State of Louisiana

**THE APPLICANT IS** Farm Fresh Food Supplier  
32451 Hwy 16  
Amite, LA 70422

**ISSUING OFFICE** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge Louisiana 70821-4313

**PREPARED BY** Molly McKean

**DATE PREPARED** June 11, 2008

**1 PERMIT STATUS****A Reason For Permit Action**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5 year term

**B NPDES permit** NPDES permit effective date N/A  
NPDES permit expiration date N/A

**C LPDES permits –** LPDES permit effective date December 1, 2003  
LPDES permit expiration date November 30, 2008

**D Date Application Received** May 27, 2008

**2 FACILITY INFORMATION****A FACILITY TYPE/ACTIVITY** pork processing

This facility prepares and packages pickled pork products. Raw pork lips, feet, and hocks are cooked in stainless steel cook tanks, then cooled with well water. Cooked products are packaged in glass jars for pickling. Processing areas are cleaned and sanitized to meet USDA requirements. Process wastewaters from cooking and cooling meat and sanitizing equipment, sanitary wastewater and stormwater are discharged to an oxidation pond system with aeration and chlorine disinfection.

**B FEE RATE**

- 1 Fee Rating Facility Type minor
- 2 Complexity Type II
- 3 Wastewater Type II
- 4 SIC code 2013

**C LOCATION** 32451 Hwy 16 Amite, St Helena Parish  
Latitude 30° 42' 1" Longitude 90° 36' 14"

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### 3 OUTFALL INFORMATION

#### Outfall 001

Discharge Type process wastewater (including cooking and cooling pork products and washwater from cleaning work areas and floor), sanitary wastewater, and stormwater  
 Treatment two grease traps, a 3 cell oxidation pond system with aeration and a chlorine contact chamber  
 Location at the point of discharge from the final oxidation pond prior to mixing with any other waters  
 Flow 0.003 MGD  
 Discharge Route Little Natalbany River via local drainage, thence into the Natalbany River

### 4 RECEIVING WATERS

STREAM Little Natalbany River via local drainage thence into the Natalbany River

BASIN AND SEGMENT Lake Pontchartrain Basin Segment 040503

DESIGNATED USES  
 a primary contact recreation  
 b secondary contact recreation  
 c propagation of fish and wildlife

### 5 TMDL STATUS

Subsegment 040503 Natalbany River Headwaters to Tickfaw River, is listed on LDEQ's Final 2006 303(d) List as impaired for phosphorus (EPA Category 5), pathogen indicators organic enrichment/low DO (EPA Category 5), and mercury. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin those suspected causes for impairment which are not directly attributed to the pork processing point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Mercury is not used or contained in any of the facility processes or products. Therefore, the discharges from this facility should not cause or contribute to the violation of water quality standards for this parameter.

Based on an evaluation of the effluent discharges, it was determined that the facility has the potential to discharge pollutants which may contribute to the phosphorus organic enrichment/low DO and pathogen indicators impairments of the receiving waterbody. Therefore, for the purposes of this permit phosphorus organic enrichment/low DO and pathogen indicators will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards. BOD<sub>5</sub> and fecal coliform colonies are limited in the permit. Total phosphorus monitoring requirements are included based on the previous permit.

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## 6 PROPOSED EFFLUENT LIMITS

BASIS See Rationale below

CHANGES FROM EXISTING PERMIT – Fecal coliform colonies monitoring frequency is increased to 1/2 weeks

## 7 COMPLIANCE HISTORY/COMMENTS

A OEC – A compliance evaluation inspection was conducted on May 5, 2005. Some permit excursions were noted at that time. The facility was advised to resubmit DMRs in lb/day instead of mg/l per the permit requirements.

B DMR Review/Excursions – A review of DMRs submitted in the past two years revealed 20 violations of the fecal coliform permit limitation. The facility was in compliance with all other permit limitations.

## 8 EXISTING EFFLUENT LIMITS

### Outfall 001

Parameter	Limitations				Sampling Frequency
	Monthly Avg Lb/d	Daily Max Lb/d	Monthly Avg Mg/l	Daily Max Mg/l	
Flow	Report	Report			Monthly
BOD <sub>5</sub>	1.91	3.81	Report	Report	Monthly
TSS	2.29	4.58		-	Monthly
Oil & Grease	0.95	1.91		-	Monthly
Fecal Coliform Colonies/100 ml	-			400	Monthly
Ammonia	-	-	Report	Report	Quarterly
Total Phosphorus			Report	Report	Quarterly
pH su			6.0 min	9.0 max	Monthly

## 9 ENDANGERED SPECIES

The receiving waterbody, Subsegment 040503 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

## 10 HISTORIC SITES

The discharge is from an existing facility location which does not include an expansion on

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for listing on the National Register of Historic Places and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required

## **11 TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application

## **12 PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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### Rationale for Farm Fresh Food Supplier

- 1 **Outfall 001** – intermittent discharge of process wastewater (including cooking and cooling pork products and washwater from cleaning work areas and floor), sanitary wastewater, and stormwater (estimated flow is 3000 gpd)

Parameter	Limitations				Reference
	Monthly Avg Lb/d	Daily Max Lb/d	Monthly Avg Mg/l	Daily Max Mg/l	
Flow	Report	Report	-	-	See below
BOD <sub>5</sub>	1 91	3 81	Report	Report	See below
TSS	2 29	4 58		--	See below
Oil & Grease	0 95	1 91	-	--	See below
Fecal Coliform Colonies/100 ml				400	See below
Ammonia			Report	Report	See below
Total Phosphorus			Report	Report	See below
pH su			6 0 min	9 0 max	See below

**Treatment** two grease traps, a 3 cell oxidation pond system with aeration, and a chlorine contact chamber

**Monitoring Frequency** 1/2 weeks for Fecal Coliform, Quarterly for Ammonia and Total Phosphorus, Monthly for all other parameters

### Limits Justification

Flow Monthly average and daily maximum reporting requirements are retained from the previously issued permit. Monthly monitoring frequency is also retained.

BOD<sub>5</sub>, TSS Monthly average and daily maximum limitations are retained from the previous permit. These limits are based on 40 CFR 432.55 (Small Processors NSPS). An allocation for the sanitary component of this wastestream was not included in the previous permit. However, the facility is consistently meeting the BOD and TSS limits. Therefore, per LAC 33 IX 2707 L 1 BOD<sub>5</sub> and TSS limits remain as previously permitted. Monthly monitoring frequency is also retained.

Oil & Grease pH Monthly average and daily maximum limitations are retained from the previous permit. These limits are based on 40 CFR 432.55 (Small Processors NSPS). Monthly monitoring frequency is also retained.

Fecal coliform These limits are retained from the previously issued permit and are based on Class I Sanitary General Permit limits. Due to compliance problems with this parameter monitoring frequency is increased to 1/2 weeks.

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Ammonia and Total Phosphorus The TMDLs for this subsegment have not been completed to date. Based on the reported values over the previous two years (Ammonia Avg = 49.7 mg/l, Phosphorus Avg = 7.6 mg/l) these reporting requirements are retained from the previous permit. This data may assist in future TMDL development. Quarterly monitoring frequency is also retained.

BPJ Best Professional Judgement  
su Standard Units

### **STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX 2511 A 1, storm water discharges shall not be required to obtain an LPDES permit "except discharges associated with industrial activity." In accordance with LAC 33:IX 2511 B 14 a k, facilities classified as SIC code 2013 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).